

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BOMBARDIER INC.,
Plaintiff,

v.

MITSUBISHI AIRCRAFT
CORPORATION, MITSUBISHI
AIRCRAFT CORPORATION AMERICA,
INC., et al.,
Defendants.

No. 2:18-cv-1543 JLR

DECLARATION OF MARY Z. GASTON IN
SUPPORT OF DEFENDANT MITSUBISHI
AIRCRAFT CORPORATION'S MOTION
TO CLARIFY ITS MOTION TO FILE
UNDER SEAL (DKT. No. 163)

NOTE ON MOTION CALENDAR:

May 31, 2019

Mary Z. Gaston declares as follows:

1. I am a partner in the law firm of Perkins Coie LLP and counsel for Defendant Mitsubishi Aircraft Corporation Japan ("MITAC") in this action. Unless otherwise stated, I make this declaration based on personal knowledge of the events and matters described herein.

2. On May 19, 2019, I was advised by counsel for Bombardier that they had completed their review of the MITAC filings that were subject to the Motion to File Under Seal (Dkt. 163.) Bombardier's counsel informed me that it was their position that four of the filed documents related to MITAC's Opposition to Bombardier's Updated Motion for a Preliminary Injunction ("Opposition") needed to be redacted, and thus filed under seal: the Declarations of

1 Jerry Riedinger (Dkt. 166), Stephen Boyd (Dkt. 167), Dr. Robert John Hansman, Jr. (Dkt. 168),
2 and Hajime Kanja (Dkt. 171).

3 3. Accordingly, the Opposition (Dkt. 165) and the Declarations of Melanie Cabot
4 (Dkt. 169), Noriyuki Hattori (Dkt. 170), Yuichi Matsumoto (Dkt. 172), Gaku Ozaki (Dkt. 173),
5 Maria Regina Piacesi (Dkt. 174), Andrew Telesca (Dkt. 175), Hiroyuki Morino (Dkt. 176),
6 Stephen Porter (Dkt. 177), and Duc Nguyen (Dkt. 178) do not require redactions and thus do not
7 need to be filed under seal.

8
9 I declare under penalty of perjury under the laws of the United States that the foregoing is
10 true and correct.

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12 Executed this 20th day of May.

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14 s/ Mary Z. Gaston

15 Mary Z. Gaston
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CERTIFICATE OF SERVICE

I certify under penalty of perjury that on May 20, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses indicated on the Court's Electronic Mail Notice List.

DATED this 20th day of May 2019.

s/ Mary Z. Gaston

Mary Z. Gaston, WSBA No. 27258

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